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## Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

13 R.E.M. International, a California )  
Partnership, appearing through its )  
14 Managing Partner, Peter V.G. Jefferson, )  
15 Plaintiff, )  
16 v. )  
17 UNITED STATES DEPARTMENT OF )  
STATE; UNITED STATES )  
18 DEPARTMENT OF HOMELAND )  
SECURITY; UNITED STATES )  
19 CITIZENSHIP AND IMMIGRATION )  
SERVICES, )  
20 Defendants. )  
21 )

No. C 05-05081-WHA

**STIPULATION TO EXTEND DUE DATE  
OF THE GOVERNMENT'S REPLY; AND  
~~PROPOSED~~ ORDER**

22 Plaintiff, by and through its attorney of record, and defendants, by and through their attorneys  
23 of record, hereby stipulate, subject to the approval of the Court, to extend the due date for the  
24 government's reply in light of the following:

25 (1) The government filed a motion to dismiss on August 10, 2007.  
26 (2) Pursuant to this Court's Amended Order Setting Schedule For Motion To Dismiss, the  
27 plaintiff's opposition was due on August 24, 2007, and the government's reply is due August 31,  
28 2007.

STIPULATION TO EXTEND DUE DATE OF GOVERNMENT'S REPLY  
C 05-05081-WHA 1

1 (3) Although the plaintiff e-filed its opposition to the government's motion to dismiss on  
2 August 24, 2007, only the first page of the 15-page opposition appeared in English of the Court's  
3 Electronic Case Filing system (see docket entry no. 39).

4 (4) Although the government notified the plaintiff of the e-filing problem on Monday  
5 morning, August 27, 2007, because of counsel's unavailability and subsequent software problems,  
6 the plaintiff was unable to correct the problem and provide the government with a legible copy of  
7 the opposition until the morning of August 29, 2007.

8 (5) The parties therefore agree, subject to approval of the Court, that the government will have  
9 until September 5, 2007, to file its reply.

18 Date: August 30, 2007 /s/  
19 RUSSELL A. ROBINSON  
Attorney for Plaintiff

## ORDER

22 Pursuant to stipulation, there being good cause therefor, IT IS SO ORDERED.

24 | Date: August 31, 2007

